REMARKS/ARGUMENTS

Claims 1-2, 4-10, and 12-19 are pending in the present application, of which claims 1 and 8 are independent. Applicant hereby amends claims 1, 4-5, 7-10, and 12-19. No new matter has been added.

The courtesies extended to Applicant's representatives by Examiner Jeffrey R. Swearingen at the interview held on January 13, 2009, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicant's record of the interview.

REJECTION UNDER 35 U.S.C. § 103(A)

On pages 3-5, the Office Action rejects claims 1-2, 4-10, and 12-19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,696,486 to Poliquin et al. (hereinafter "Poliquin") and U.S. Patent No. 6,816,903 to Rakoshitz et al. (hereinafter "Rakoshitz"). Applicant respectfully traverses this rejection for the reasons set forth below.

Independent claims 1 and 8 now recite the following subject matter: "**identifying and explicitly separating** a plurality of policy conditions into passive and triggering conditions" (emphasis added). This subject matter finds support in the specification, for example, in paragraph [20].

The Office Action alleges that the combination of Poliquin and Rakoshitz provides both passive and triggering conditions, alleging that Poliquin's alarms are triggering conditions and that Rakoshitz uses passive conditions. However, the references of record clearly do not disclose, suggest, or teach explicit separation of policy conditions into passive and triggering categories. Thus, Applicant respectfully submits that the combination of Poliquin and Rakoshitz does not disclose, suggest, or teach "**identifying and explicitly separating** a plurality of policy conditions into passive and triggering conditions."

Independent claims 1 and 8 further recite the following subject matter: "grouping a plurality of policies having an **identical** triggering condition that results in an **identical** policy decision into a policy equivalency class" (emphasis added). This subject matter finds support, for example, in paragraph [19]. A policy equivalency class is a set of policies, regardless of type, that is to be enforced upon the occurrence of identical triggering conditions.

As disclosed on lines 21-34, Poliquin's policy window uses all currently defined policies [line 23]. A window may show all filters that make up a policy. However, Poliquin does not group policies having an **identical** triggering condition that results in an **identical** policy decision. Rakoshitz fails to remedy this deficiency.

Independent claims 1 and 8 further recite the following subject matter: "wherein said passive conditions are arranged according to a **precedence ranking** and when said policy equivalency class is related to one of said triggering conditions, said policy equivalency class takes a **higher priority**" (emphasis added). This subject matter finds support, for example, in paragraph [23].

As discussed during the Interview on January 13, 2009, the references of record do not ensure that passive conditions are arranged according to a **precedence ranking** and that when a policy equivalency class is related to one of the triggering conditions, that policy equivalency class takes a **higher priority**. Neither Poliquin nor Rakoshitz deals with a combined precedence ranking of both passive conditions and triggering conditions. Because Poliquin only deals with alarms related to triggering conditions, Poliquin cannot arrange passive conditions according to a precedence ranking.

Accordingly, Applicant respectfully submits that independent claims 1 and 8 are allowable over the references of record.

Claims 2 and 4-7 depend from allowable independent claim 1. Claims 9, 10, and 12-19 depend from allowable independent claim 8. Thus, Applicant respectfully submits that claims 2, 4-7, 9-10, and 12-19 are allowable at least on the basis of their respective dependencies upon allowable independent claims.

Accordingly, Applicant respectfully requests that the rejection of claims 1-2, 4-10, and 12-19 under 35 U.S.C. § 103(a) be withdrawn.
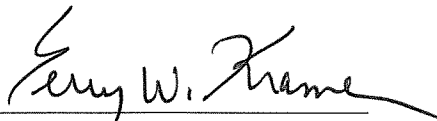
CONCLUSION

While we believe that the instant amendment places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner telephone the undersigned attorney in order to expeditiously resolve any outstanding issues.

In the event that the fees submitted prove to be insufficient in connection with the filing of this paper, please charge our Deposit Account Number 50-0578 and please credit any excess fees to such Deposit Account.

Respectfully submitted,
KRAMER & AMADO, P.C.

Date: _____January 19, 2009_____

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